



IN REPLY  
REFER TO:

# DEFENSE INFORMATION SYSTEMS AGENCY

701 S. COURTHOUSE ROAD  
ARLINGTON, VIRGINIA 22204-2199

Regulatory/General Counsel

March 14, 1997

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MAR 14 1997

William S. Caton  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Federal Communications Commission  
Washington, D.C.

Re: Notification of *Ex Parte* in WT Docket 96-86, Cellular Priority Access Service

Dear Mr. Caton,

This is to inform you of an *ex parte* contact in the above referenced proceeding.<sup>1</sup> On February 25, 1997, members of the staff of the National Communications System (NCS) met with representatives of the Policy Division of the Wireless Telecommunications Bureau to discuss the NCS' Petition for Rulemaking relating to establishment of rules for Cellular Priority Access Service. Notice of that *ex parte* were filed that day.

At the February 25th meeting, the Commission staff asked the NCS staff to provide additional information. That information is in the form of a letter to John Cimko. It is attached hereto.

Please contact the undersigned at (703) 607-6092 should any questions arise in connection with this notification.

Attachment a/s

Paul R. Schwedler

<sup>1</sup>The particular issue discussed at the meeting is that contained in Public Notice DA 96-604, dated April 18, 1996, which referred to WT Docket No. 96-86.

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## DEFENSE INFORMATION SYSTEMS AGENCY

701 S. COURTHOUSE ROAD  
ARLINGTON, VIRGINIA 22204-2199

Regulatory/General Counsel

March 14, 1997

John Cimko  
Chief, Policy Division  
Wireless Telecommunications Bureau  
Federal Communications Commission  
1919 M Street, NW  
Washington, D.C. 20554

RE: National Communications System Petition for Rulemaking  
Regarding Cellular Priority Access Service

Dear Mr. Cimko,

First let me convey my thanks to you and your staff for meeting with representatives of the National Communications System (NCS) on February 25, 1997. We are also pleased that counsel for the National Emergency Numbering Association (Jim Hobson) and the Association of Public-Safety Communications Officials-International, Inc. (Bob Gurss) were able to be present.

At the close of the meeting, there were questions presented to the NCS participants and the purpose of this communication is to provide the additional information sought. Notice of the *ex parte* February 25, 1997 meeting and the matters discussed were filed by the NCS with the Secretary's office on that date. This letter will be filed with the Secretary today.

Our notes reflect information was requested on five specific matters:

1. Status of the standards process
2. Digital vs. analog
3. Identification of companies "ready to go"
4. Applicability to all wireless rather than cellular only
5. Information on the GSA contract


NCS technical personnel have responded to these questions. The primary source for the answers is Mr. Jonathan Bae, who may be reached at (703) 607-6135 for additional information or clarification. The responses to the questions are attached.

Not specifically requested but information deemed relevant is that related to other proposed or actual cellular priority schemes. Unless the Commission acts to establish a single,

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nationwide, and uniform system for cellular priorities, "ad hoc" approaches will develop which will make interoperability impossible. The NCS is aware of legislation in Oregon which required the Oregon Emergency Management Office to develop a plan by January, 1995 to obtain cellular priority access. Oregon has participated in the development of the cellular priority access plan proposed by the NCS. It is known that a cellular priority access scheme based on channel reservation technology was used during the Oklahoma city bombing incident. The State of Florida has filed in this proceeding its own version of a cellular priority scheme. The NCS examined a channel reservation scheme for priority cellular access provided by Sprint Cellular in Portsmouth, Virginia and was given a demonstration by (then) McCaw Cellular, also of a channel reservation scheme. These are the cellular priority access schemes of which the NCS is aware. There may be, and likely are, more. It is essential that there be one scheme for cellular priority access authorized by the Commission so that interoperability nationwide can be assured.

I would be pleased to respond to any further requests for information. I believe that CPAS will be an important National Security and Emergency Preparedness tool that should be made available as soon as possible.

  
CARL WAYNE SMITH  
Acting General Counsel

## **1. Status of the standards process**

- A. The Priority Access and Channel Assignment (PACA) standard (initially started in IS-53) has been modified and finalized as an ANSI standard 664 (i.e., PACA feature description).
- B. The Intersystem Operation of cellular network standard has been modified and completed in EIA/TIA IS-41 Rev C to incorporate PACA provisions for roaming. Most carriers currently implemented IS-41 Rev. A or B, but some has a plan to implement IS-41 Rev C by later this year.
- C. The digital air interface standard, EIA/TIA IS-136.1-A for TDMA has been modified to include the PACA messages, but the EIA/TIA IS-95 for CDMA is not yet completed, although it is in the final balloting stage.

## **2. Digital vs. analog**

The CPAS feature is designed and being implemented only for the NS/EP users who will have to acquire a commercial off-the-shelf or dual-mode handset when it is built in accordance with the digital air interface standards. The digital air interface standards will allow the handset to be idle while waiting in a queue and permit the system to periodically update users on the status of queue by a means of either visual indication or audible tone. All this signaling will be done through a digital control channel (DCCH). The current analog phone will not work with the CPAS scheme, because it has a five-second timeout. This means that if an analog handset doesn't get a channel in five seconds, then it will terminate the connection. For CPAS to work with analog would require that cellular service providers implement the CPAS scheme differently than currently designed and envisioned, or implement two different CPAS schemes. Cellular carriers could technically implement it so that system would call back the handset when a channel becomes available. Carriers are reluctant to discuss this implementation because the entire industry is moving to digital. Given the trend in the industry is toward digital service for competitive and capacity reasons, it would seem unlikely that any providers would invest in analog equipment. As is typical, when a new and advanced feature comes out in a market, users typically acquire an improved device to support the feature.

## **3. Identification of companies that are "ready to go"**

**Vendor:** A large vendor has written a PACA feature description document, and presumably is in the specification writing stage. Software (commercial grade) won't be available until at least the end of 1997 for TDMA, and mid-1998 for CDMA.

**Carriers:** GTE Government Systems under the FWTS contract is willing to support the CPAS implementation with its 54 partnering carriers if the CPAS rules are in place.

A leading carrier has indicated a strong interest in implementing the CPAS capability, and also requested that the FCC issue the CPAS rules.

#### **4. Applicability to all wireless rather than cellular only**

Many of the PCS providers and Mobile Satellite System (MSS) providers have talked about several types of priority systems and different ideas on assigning priority levels that may be inconsistent with the current CPAS scheme and rules. It would appear to be in the public interest to expand the CPAS rule to cover the full spectrum of wireless or, at least, have a provision to cover all wireless when applicable. As far as the PCS is concerned, we have been working with standards bodies to develop Enhanced PACA (E-PACA) and it is in near completion. The other CPAS standards should support the PCS (i.e., the spectrum is irrelevant).

#### **5. Information on the GSA contract**

The CPAS requirements are included in the GSA's Federal wireless Telecommunications Services (FWTS) contract as an emerging requirement. It couldn't be a core requirement simply because CPAS would not be available at time of contract award. CPAS is not a mandatory offering, but the requirement indicates the government's desire for implementation within two years. The bidders were evaluated partly on their ability and intent to provide the capability. The contractor is required to coordinate with the CPAS program office for priority assignments in accordance with FCC rules and to comply with standards as developed. The FWTS contract will assist the timely implementation by providing a single point of contact (i.e., GTE Government Systems with 54 carriers), economies of scale, and a service trial leading to a commercial development. The contract can now be modified to provide for the service trial and NCS staff has already met with GSA and provided the Statement of Work to solicit a GTE proposal for the service trial.